

WWR# 21336637

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Case No 16-18380-sr

Monica A Adduci

Debtor

CHAPTER 13

PNC Bank, NA.

Movant

Monica A Adduci
Frederick L. Reigle, Trustee

Respondents

OBJECTION TO DEBTOR'S CHAPTER 13 PLAN

AND NOW, comes Movant, PNC Bank, NA., by and through its counsel, Keri P. Ebeck, Esquire, and respectfully represents the following:

1. On 12/05/2016, the Debtor filed a voluntary petition commencing a case under Chapter 13, Title 11, United States Code, and for the entry of an order for relief.
2. This is an action under 11 U.S.C. Section 1324, which provides a party in interest may object to confirmation of the plan.
3. The Creditor will be filing a secured Proof of Claim for the approximate amount of \$74,468.72 prior to the court deadline.
4. On 12/19/2016, Debtor filed a Chapter 13 Plan that does not list the Creditor PNC Bank, NA. within the plan. .
5. Debtor's Plan should not be confirmed in accordance with 11 U.S.C. Section 1325. Debtor's Plan is in violation of 11 U.S.C., Section 1325(a) and fails to provide PNC Bank, NA. with adequate protection of its interests.

WHEREFORE, Movant prays this Honorable Court to deny confirmation of the Debtor's proposed Plan.

Respectfully submitted,

BY: /s/ Keri P. Ebeck

PA I.D. No. 91298

Weltman, Weinberg & Reis Co., L.P.A.

436 7th Avenue

Suite 2500

Pittsburgh, PA 15219

(412) 434-7955